

EXHIBIT B

From: [Richard Min](#)
To: [Flores, Rommy](#); [Camilla Redmond](#)
Cc: [Lash Brittani](#); [Jacobson-Kwok Michelle](#); [*** Diasrespondent - External](#)
Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE REQUESTED FROM COUNSEL FOR MR. DIAS
Date: Sunday, December 22, 2024 5:07:45 PM

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Dear Rommy,

We reject your characterizations and misrepresentations.

With respect to the provisions of the stipulated order, here is our response as follows:

No. 8. - Petitioner accepted service of DVRO which is what was required. Whatever arguments he makes in CA state courts afterwards are not relevant to this matter.

No. 9. - Petitioner submitted a Declaration on this matter on November 18, 2024 stating exactly what was required pursuant to this provision.

No. 11, No. 12. - Petitioner recently received an email from Terra Firma and will address. We acknowledge your threat that visitation will cease without further payment.

No. 13. - Petitioner has not given any notice because there are no current plans to travel to CA. We do not need to confirm with your our discussions with our client on any matter. He is aware of his obligations.

No. 13.g. - Petitioner has not contacted Respondent, except via OFW. Per our understanding, following inappropriate comments about Petitioner's wellbeing by the Respondent, Petitioner has kindly requested the Responder to avoid such comments and focus exclusively on the Children's updates.

If you seek to make any frivolous motions, we reserve all rights. Hopefully this addresses your above concerns without further need of a meet and confer. I have been in depositions all day the past few days and will be on vacation next week.

Richard Min|Green Kaminer Min & Rockmore LLP

420 Lexington Ave. Ste. 2821|New York, NY 10170

O: 212.681.6400|D: 212.257.1944|F: 212.681.6999

rmin@gkmrlaw.com|www.gkmrlaw.com

Fellow of the International Academy of Family Lawyers

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Disclosure under IRS Circular 230: To ensure compliance with requirements imposed by the IRS, we inform you that any tax advice contained in this communication (including any

attachments) was not intended or written to be used, and may not be used, for the purpose of avoiding tax-related penalties under federal, state or local tax law or promoting, marketing or recommending to another party any transaction or matter addressed therein.

From: Flores, Rommy <RFlores@gibsondunn.com>

Sent: Friday, December 20, 2024 9:13 PM

To: Richard Min <rmin@gkmrlaw.com>; Camilla Redmond <credmond@gkmrlaw.com>

Cc: Lash Brittani <brittani@ljtlawgroup.com>; Jacobson-Kwok Michelle <Michelle@ljtlawgroup.com>; *** Diasrespondent - External <Diasrespondent@gibsondunn.com>

Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE REQUESTED FROM COUNSEL FOR MR. DIAS

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Richard –

We continue to be very concerned about your apparent refusal to engage in meet and confer efforts with us regarding your client's violations of various conditions of Judge Chen's November 13 Order dismissing your client's Hague petition with prejudice *but with certain conduct and other conditions required*.

We are available this weekend or early Monday morning to meet and confer live (zoom, telephone, Teams, etc.) Otherwise, we will be forced to seek relief before the court.

Thanks,

Rommy Flores
Associate Attorney

T: +1 213.229.7966 | M: +1 213.335.1672
RFlores@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Flores, Rommy <RFlores@gibsondunn.com>

Sent: Thursday, December 19, 2024 10:15 AM

To: Richard Min <rmin@gkmrlaw.com>; Camilla Redmond <credmond@gkmrlaw.com>; Azcona R <lr_azcona@yahoo.com>

Cc: Lash Brittani <brittani@ljtlawgroup.com>; Jacobson-Kwok Michelle

<Michelle@jltlawgroup.com>; *** Diasrespondent - External <Diasrespondent@gibsondunn.com>

Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE REQUESTED FROM COUNSEL FOR MR. DIAS

Richard –

We are gravely concerned that you apparently have ceased to be responsive as counsel for Mr. Dias. We are writing to inform you that your client is in violation of the stipulated order signed by Judge Chen on November 13. Specifically:

- **No. 8.** Requiring Mr. Dias to “accept service and cooperate as to service of custody, visitation, and domestic violence pleadings”. In state court yesterday, Mr. Dias argued that the California court had no jurisdiction over him in relation to the DVRO proceedings. This is in direct contravention to the stipulated order (and Judge Chen’s minute order) requiring him to submit to California for jurisdiction of custody, visitation, and *domestic violence pleadings*.
- **No. 9.** Both you and your client continue to be less than forthright about whether he has duly searched for the Children’s original birth certificates and Portuguese consular documents that are used for travel. Your client was known to have these in his possession at all times and now claims to not be able to locate them. Nevertheless, you have not provided an amended declaration of where your client searched, and the steps he took, to locate these documents. This is required by the court’s order: “Petitioner cannot locate these documents, he is to produce a declaration stating that he cannot locate the requested documents and affirm that all documents that can be used to travel internationally have been surrendered to the Court. If Petitioner finds any of these documents, he must turn them over immediately.”
- **No. 11, No.12.** The court clearly states that “Until a California state court issues (1) a decision on the merits of a domestic violence restraining order or issues a temporary domestic violence restraining order or (2) a California state court assumes jurisdiction over, and issues a temporary or permanent decision on, legal and physical custody over the Children” the Court’s orders for Motions for Access (ECF No. 98] and Further Order (ECF No. 106) are **in full force and effect**. Those orders require that Petitioner pay for the costs of Terra Firma [ECF No. 98, paragraph 1(b)] and advance all fees. Yet, he has not done so. Ms. Dias will not pay for Terra Firma fees and if Terra Firma does not continue the visits without payment, they will simply cease as Terra Firma is the required supervisory agency for the visits.
- **No. 13.** Neither you nor Petitioner’s new attorney Ms. Azcona have agreed to inform Ms. Dias’s state counsel that your mutual client will give notice to you/Ms. Dias’s client as to when he is in California within 72 hours. We find this lack of transparency extremely concerning.
- **No. 13(g)(ii).** Petitioner has been sending personal messages to Respondent via Our Family Wizard about their relationship, in direct violation of Paragraph 13(g)(ii) of the Stipulated Order requiring that your client only discuss the Children with Respondent

(“Petitioner shall not call, text, email, or otherwise contact Respondent... except as otherwise permitted by this Order.”)

We are happy to meet and confer with you on these issues tomorrow or Monday 12/23. If we do not hear back from you by Monday, we will move to show cause before the Court as your client is in contempt of a federal court order in full force and effect at this time.

Rommy Flores
Associate Attorney

T: [+1 213.229.7966](tel:+12132297966) | M: [+1 213.335.1672](tel:+12133351672)
RFlores@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Flores, Rommy
Sent: Monday, December 16, 2024 5:22 PM
To: 'Richard Min' <rmin@gkmrlaw.com>; Davis, Thad A. <TDavis@gibsondunn.com>
Cc: Camilla Redmond <credmond@gkmrlaw.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Lash Brittani <brittani@ljtlawgroup.com>; Jacobson-Kwok Michelle <Michelle@ljtlawgroup.com>; Azcona R <lr_azcona@yahoo.com>
Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE REQUESTED FROM COUNSEL FOR MR. DIAS

Richard — we appreciate you were in trial, but we do need you to confirm you are still counsel to Mr. Dias. We also do need to confirm and have your client attest this week to searching his black briefcase and which particular residences and that he still could not locate the materials. Please send the updated declaration as soon as possible

Given the upcoming hearing and holidays and potential for travel etc., we need that confirmed as soon as possible. We also need him reminded of the guidelines for OFW and we need proper notice if he travels to the US.

We received the ECF Notice that Ms. Shindell-DeLacey has withdrawn from the case.

Rommy Flores
Associate Attorney

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GIBSON DUNN

Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Richard Min <rmin@gkmrlaw.com>

Sent: Friday, December 13, 2024 1:18 PM

To: Davis, Thad A. <TDavis@gibsondunn.com>; Flores, Rommy <RFlores@gibsondunn.com>

Cc: Camilla Redmond <credmond@gkmrlaw.com>; Waddick, Nicole <NWaddick@gibsondunn.com>;
Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>;
Lash Brittani <brittani@ljtlawgroup.com>; Jacobson-Kwok Michelle <Michelle@ljtlawgroup.com>;
Azcona R <lr_azcona@yahoo.com>; Shindell DeLacey Kelly <kelly@drsfamilylaw.com>

Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE
REQUESTED FROM COUNSEL FOR MR. DIAS

Thad,

Appreciate your email but I just concluded with trial today so playing a bit of catch up. We will take the necessary action and fine with you sending emails to me while we are still on the case. I'm not sure what you are asking though. Are you asking for me to confirm that Mr. Dias will abide by the federal order that he is give notice before coming to CA? I am not part of any conversations with local CA counsel so I can't speak to that. I, of course, will comply with providing any information that is required if I have any such information and will relay to Mr. Dias that the federal court order continues to be in place if that is what you are seeking. I don't believe that needs to be reiterated but happy to do so.

Richard Min | Green Kaminer Min & Rockmore LLP

rmin@gkmrlaw.com | www.gkmrlaw.com

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From: Davis, Thad A. <TDavis@gibsondunn.com>

Sent: Friday, December 13, 2024 4:10 PM

To: Flores, Rommy <RFlores@gibsondunn.com>

Cc: Richard Min <rmin@gkmrlaw.com>; Camilla Redmond <credmond@gkmrlaw.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Lash Brittani <brittani@ljtlawgroup.com>; Jacobson-Kwok Michelle <Michelle@ljtlawgroup.com>; Azcona R <lr_azcona@yahoo.com>; Shindell DeLacey Kelly <kelly@drsfamilylaw.com>

Subject: Re: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE REQUESTED FROM COUNSEL FOR MR. DIAS

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Richard –

We continue not to understand why you apparently refuse to respond to the simple questions below. We remind you that you are an officer of the court and as such you have certain obligations. If you still represent Mr. Dias, please confirm. If you still represent Mr. Dias, can you also please confirm that you will advise Ms. Dias' counsel should your client be in California at least 72 hours before such time. The Court's conditions on the dismissal of the Hague case were premised on the CA state court taking over jurisdiction, which it has not yet done (and may not even do on 12/18 if that matter is continued). If you no longer represent Mr. Dias, you are required to withdraw from his case and seek Court permission to do so. We have not gotten any notification from ECF that that has been done. Again, we will **not** be contacting your client when he is duly represented by both you and Ms. Azcona.

Additionally, you and Ms. Shindell DeLacey **both** appeared in the Hague matter. You are both required by the N.D. California Local Rules to withdraw by order of the Court. See L.R. 11-5 "Withdrawal from Case" ("Counsel may not withdraw from an action until relieved by order of the Court after written notice has been provided, reasonably in advance, to the client and to all other parties who have appeared in the case").

Please respond to our inquiries today, or it will necessitate that we flag this and the resulting potential safety issue around observing of the existing conduct order to the Court. As Mr. Dias' new, additional family law counsel Ms. Azcona has expressly disavowed observing any Court ordered conduct order she "didn't negotiate" and has strangely injected issues of financial "surety" into this as an excuse for not carrying out the conduct order we are left to seek whatever relief it takes to keep Ms. Dias and the children safe.

Regards,

Thad A. Davis

Partner

T: [+1 415.393.8251](tel:+14153938251) M: +1 415 730 5434

TDavis@gibsondunn.com

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

One Embarcadero Center Suite 2600, San Francisco, CA 94111-3715

On 11/12/2024, at 14:44, Flores, Rommy <RFlores@gibsondunn.com> wrote:

Additionally, if you are no longer representing him, you need to withdraw as counsel by court order.

<https://cand.uscourts.gov/rules/civil-local-rules/>

So please clear this up for us. We will not contact a person that is represented by multiple counsel.

Rommy Flores

Associate Attorney

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RFlores@gibsondunn.com

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Flores, Rommy

Sent: Wednesday, December 11, 2024 10:07 AM

To: 'Richard Min' <rmin@gkmrlaw.com>; Camilla Redmond <credmond@gkmrlaw.com>

Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>;

Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>;

Brittani Lash <brittani@ljtlawgroup.com>; Michelle Jacobson-Kwok <michelle@ljtlawgroup.com>; R Azcona <lr_azcona@yahoo.com>

Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE REQUESTED FROM COUNSEL FOR MR. DIAS

Richard –

Are you/your firm no longer representing him? Can you please confirm one way or the other?

Thanks,

Rommy Flores
Associate Attorney

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RFlores@gibsondunn.com

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Richard Min <rmin@gkmrlaw.com>

Sent: Wednesday, December 11, 2024 10:04 AM

To: Flores, Rommy <RFlores@gibsondunn.com>; Camilla Redmond <credmond@gkmrlaw.com>

Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Brittani Lash <brittani@ljtlawgroup.com>; Michelle Jacobson-Kwok <michelle@ljtlawgroup.com>; R Azcona <lr_azcona@yahoo.com>

Subject: Re: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE REQUESTED FROM COUNSEL FOR MR. DIAS

He asked that you reach out to him directly.

From: Flores, Rommy <RFlores@gibsondunn.com>

Sent: Wednesday, December 11, 2024 1:00:28 PM

To: Richard Min <rmin@gkmrlaw.com>; Camilla Redmond <credmond@gkmrlaw.com>

Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Brittani Lash <brittani@ljtlawgroup.com>; Michelle Jacobson-Kwok <michelle@ljtlawgroup.com>; R Azcona <lr_azcona@yahoo.com>

Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE REQUESTED FROM COUNSEL FOR MR. DIAS

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[@Richard Min @Camilla Redmond](#): Can you please respond to the below?

Thanks so much,
Rommy

Rommy Flores
Associate Attorney

T: +1 213.229.7966 | M: +1 213.335.1672
RFlores@gibsondunn.com

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Flores, Rommy

Sent: Tuesday, December 10, 2024 5:50 PM

To: 'Kelly Shindell DeLacey' <kelly@drsfamilylaw.com>; Richard Min <rmin@gkmrlaw.com>; Camilla Redmond <credmond@gkmrlaw.com>; Maria Garrett de Liévano <maria@drsfamilylaw.com>

Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Brittani Lash <brittani@ljtlawgroup.com>; Michelle Jacobson-Kwok <michelle@ljtlawgroup.com>; R Azcona <lr_azcona@yahoo.com>

Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE REQUESTED FROM COUNSEL FOR MR. DIAS

Thanks, Kelly. Appreciate the update. [@Richard Min](#): can you advise on your current role?

Is Mr. Dias currently pro so as to the Hague matter as well? While the case has been dismissed, there are conditions attached that do not expire until CA state court takes over, so we'd like to know who we are supposed to be in contact with regarding the conditions that Mr. Dias agreed to before a federal court.

Thanks,
Rommy

Rommy Flores
Associate Attorney

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RFlores@gibsondunn.com

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Kelly Shindell DeLacey <kelly@drsfamilylaw.com>

Sent: Tuesday, December 10, 2024 4:42 PM

To: Flores, Rommy <RFlores@gibsondunn.com>; Richard Min <rmin@gkmrlaw.com>; Camilla Redmond <credmond@gkmrlaw.com>; Maria Garrett de Liévano <maria@drsfamilylaw.com>

Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Brittani Lash <brittani@ljtlawgroup.com>; Michelle Jacobson-Kwok <michelle@ljtlawgroup.com>; R Azcona <lr_azcona@yahoo.com>

Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE REQUESTED FROM COUNSEL FOR MR. DIAS

Rommy:

My firm is not representing Mr. Dias in his California family law action and are no longer involved in the Hague matter now that is has resolved. I have informed Ms. Jacobson-Kwok of this previously.

Kelly J. Shindell DeLacey

Partner

<image001.png>

DeLacey, Riebel & Shindell
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San Francisco, CA, 94104

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From: Flores, Rommy <RFlores@gibsondunn.com>

Sent: Tuesday, December 10, 2024 4:14 PM

To: Richard Min <rmin@gkmrlaw.com>; Camilla Redmond <credmond@gkmrlaw.com>; Kelly Shindell DeLacey <kelly@drsfamilylaw.com>; Maria Garrett de Liévano <maria@drsfamilylaw.com>

Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Brittani Lash <brittani@ljtlawgroup.com>; Michelle Jacobson-Kwok <michelle@ljtlawgroup.com>; R Azcona <lr_azcona@yahoo.com>

Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States - RESPONSE

REQUESTED FROM COUNSEL FOR MR. DIAS

Importance: High

Richard, Camilla, Maria, and Kelly –

Your client is subject to a federal court order that requires him to inform Ms. Dias's attorneys as to when/where he will be in CA within 72 hours, among many other conditions (see attached). Ms. Azcona below notes that she is not his attorney for these purposes. But our responses to your teams have gone unanswered and our inquiries ignored. **Kelly/Maria:** Can you please inform us who represents Mr. Dias and for what purposes? Mr. Dias cannot avoid responsibility per a federal court order based on having different attorneys for different matters; someone represents him as to family matters which we believed was Ms. Shindell DeLacey. If that has changed, please inform as at once if he has other representation for his family law matters and who that representation is. If Mr. Dias is proceeding pro se on the family law matters, we'd like to know that as well.

Richard/Camilla – you represent Mr. Dias in relation to his Hague petition. Does that representation continue now as the federal court order is still very much in effect *until such time that the state court takes over*. Can you confirm that you still represent Mr. Dias as well? If not, can you advise if he is proceeding pro se on his Hauge-related matters?

Please let us know as soon as possible.

Thanks,
Rommy

Rommy Flores
Associate Attorney

T: +1 213.229.7966 | M: +1 213.335.1672
RFlores@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: R Azcona <lr_azcona@yahoo.com>

Sent: Tuesday, December 10, 2024 3:56 PM

To: Michelle Jacobson-Kwok <michelle@ljtlawgroup.com>; Flores, Rommy
<RFlores@gibsondunn.com>

Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>;
Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>;
Brittani Lash <brittani@ljtlawgroup.com>

Subject: Re: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States

Leslie Robin Azcona
Attorney at Law
SB#164279

3478 Buskirk Avenue #261
Pleasant Hill, CA 94523
(925) 596 - 0107 (925) 969-9688 FAX
lr_azcona@yahoo.com

Dear Rommey Flores:

No.

I was not the attorney who negotiated the stipulation on his behalf, and I am not his personal surety.

I have forwarded this information to Mr. Dias.

Yours truly,

Leslie Robin Azcona
Attorney at Law
(925) 596 - 0107
lr_azcona@yahoo.com

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On Tuesday, December 10, 2024 at 03:11:57 PM PST, Flores, Rommy <rflores@gibsondunn.com> wrote:

Thank you – can you confirm that for any upcoming visits in person you will ensure that Mr. Dias gives our client’s family attorney (Michelle and Brittani) at least 72 hours’ notice before coming to CA?

Thanks,

Rommy Flores
[Associate Attorney](#)

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RFlores@gibsondunn.com

GIBSON DUNN

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Leslie Robin Azcona
Attorney at Law
SB#164279

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Dear :

Yours truly,

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From: R Azcona <lr_azcona@yahoo.com>
Sent: Tuesday, December 10, 2024 2:49 PM
To: Michelle Jacobson-Kwok <michelle@ljtlawgroup.com>; Flores, Rommy <RFlores@gibsondunn.com>
Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse, Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>;

Brittani Lash <brittani@ljtlawgroup.com>

Subject: Re: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States

Thank you.

I will forward this e mail to Mr. Dias.

He will not be coming to the US for the 12/18/24 hearing. He will appear remotely. He will also be making a special appearance remotely at a hearing set for January 8, 2024.

Leslie Robin Azcona

On Tuesday, December 10, 2024 at 02:10:54 PM PST, Flores, Rommy <rflores@gibsondunn.com> wrote:

Ms. Azcona –

Attached is the federal court order in effect for this case until such time that the California state court takes over for purposes of custody. Mr. Dias's Hague counsel and his (former?) counsel Ms. Shindell DeLacey have been unresponsive to our requests for a response.

Mr. Dias *must* –according to Judge Chen of the Central District of California – give at least 72 hours' notice before he lands in California. The court order lays out the exact parameters and conditions Mr. Dias must adhere to lest he be in violation of a federal court order.

Thanks,

Rommy

Rommy Flores
[Associate Attorney](#)

T: +1 213.229.7966 | M: +1 213.335.1672
RFlores@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP

333 South Grand Avenue, Los Angeles, CA 90071-3197

From: R Azcona <lr_azcona@yahoo.com>
Sent: Tuesday, December 10, 2024 2:04 PM
To: Michelle Jacobson-Kwok <michelle@ljtlawgroup.com>
Cc: Flores, Rommy <RFlores@gibsondunn.com>; Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse, Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Brittani Lash <brittani@ljtlawgroup.com>
Subject: Re: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States

Leslie Robin Azcona

Attorney at Law

SB#164279

3478 Buskirk Avenue #261

Pleasant Hill, CA 94523

(925) 596 - 0107 (925) 969-9688 FAX

lr_azcona@yahoo.com

Dear Michelle Jacobson-Kwok:

Mr. Dias will not be physically present on December 18, 2024. I will forward this message to him. I would imagine any trips to this country would involve visitation, so there would be more than ample notice to coordinate those plans.

I was in trial last week, am out all day tomorrow, and am still reviewing the documents available to me in this case. I do not know whether we will be asking to continue this matter - as discussed, there are jurisdictional issues with witnesses, documents and authentication.

Yours truly,

Leslie Robin Azcona

Attorney at Law

(925) 596 - 0107

lr_azcona@yahoo.com

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On Tuesday, December 10, 2024 at 11:39:03 AM PST, Michelle Jacobson-Kwok <michelle@ljtlawgroup.com> wrote:

Hello Leslie,

Further to our conversation last week, it's my understanding that your client is planning to request a continuance of the 12/18 hearing. Can you confirm that is still his intention?

Further, per the "exit" orders from the Hague case, he is to provide us with at least 72 hours' notice if he intends to enter the country. His Hague counsel have been unresponsive to Rula's counsel's request for update regarding same. Does he plan to be physically present on 12/18 or will he be abroad for the hearing?

Thank you,

Michelle Jacobson-Kwok

CFLS*

List Jacobson-Kwok Thorndal, LLP

3645 Grand Avenue, Suite 202

Oakland, CA 94610

Telephone: 510-302-6600

Facsimile: 510-302-6611

<image002.png>

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PLEASE TAKE NOTICE. I will be unavailable for all purposes on the following dates: November 15 and 22-29, 2024; December 2-4, 9-11, 17, 23-27 and 31, 2024; January 1, 9 and 14-21, 2025. During said period, I will be unavailable for any purpose whatsoever, including but not limited to receiving notices of any kind, responding to ex parte applications, appearing in court or at depositions, drafting of pleadings, responding to motions, responding to discovery requests, or providing legal services in the above matter.

You are advised to read *Tenderloin Housing Clinic, Inc. v. Sparks*, 8 Cal. App.4th 299 regarding the availability of sanctions for purposefully scheduling a conflicting proceeding without good cause.

From: Flores, Rommy <RFlores@gibsondunn.com>

Sent: Tuesday, December 10, 2024 10:33 AM

To: Richard Min <rmin@gkmrlaw.com>; Michael Banuchis <MBanuchis@gkmrlaw.com>; Kelly Shindell DeLacey <kelly@drsfamilylaw.com>; Garrett de Liévano Maria <maria@drsfamilylaw.com>; Camilla Redmond <credmond@gkmrlaw.com>

Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse, Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Michelle Jacobson-Kwok <Michelle@ljtlawgroup.com>; Brittani Lash <brittani@ljtlawgroup.com>

Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States

All –

Following up on the below.

Thanks,

Rommy

Rommy Flores
Associate Attorney

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RFlores@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Flores, Rommy
Sent: Wednesday, December 4, 2024 2:48 PM
To: 'Richard Min' <rmin@gkmrlaw.com>; 'Michael Banuchis' <MBanuchis@gkmrlaw.com>; 'Kelly Shindell DeLacey' <kelly@drsfamilylaw.com>; 'Garrett de Liévano Maria' <maria@drsfamilylaw.com>; 'Camilla Redmond' <credmond@gkmrlaw.com>
Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse, Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; 'Michelle Jacobson-Kwok' <Michelle@ljtlawgroup.com>; 'Brittani Lash' <brittani@ljtlawgroup.com>
Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States

Hi Kelly, Maria –

Checking in on this again.

Thanks,

Rommy

Rommy Flores
Associate Attorney

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RFlores@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Flores, Rommy
Sent: Tuesday, December 3, 2024 9:28 AM
To: 'Richard Min' <rmin@gkmrlaw.com>; Michael Banuchis <MBanuchis@gkmrlaw.com>; Kelly Shindell DeLacey <kelly@drsfamilylaw.com>; Garrett de Liévano Maria <maria@drsfamilylaw.com>; Camilla Redmond <credmond@gkmrlaw.com>
Cc: Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse, Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Michelle Jacobson-Kwok <Michelle@ljtlawgroup.com>; 'Brittani Lash' <brittani@ljtlawgroup.com>
Subject: RE: Dias v. Dias: Petitioner's Declaration - Notice of Visits to the United States

Richard, Kelly et al. –

Given that the first state court hearing is upcoming on December 18, we wanted to flag for you the requirement in the Judge's dismissal order that Casimiro is to give 72 hours notice to Rula's *state* counsel if he intends to be in the United States.

Can you please confirm that you will inform Michelle Jacobson-Kwok and Brittani Lash, Rula's state law attorneys (cc'd here), should Casimiro travel to the United States?

Thanks very much,

Rommy

Rommy Flores
Associate Attorney

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RFlores@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Richard Min <rmin@gkmrlaw.com>
Sent: Wednesday, November 27, 2024 3:07 PM
To: Flores, Rommy <RFlores@gibsondunn.com>
Cc: Camilla Redmond <credmond@gkmrlaw.com>; Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse, Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Michael Banuchis <MBanuchis@gkmrlaw.com>; Kelly Shindell DeLacey <kelly@drsfamilylaw.com>; Garrett de Liévano Maria <maria@drsfamilylaw.com>
Subject: RE: Dias v. Dias: Petitioner's Declaration

Rommy, he says he checked the briefcase and did not locate the documents there.

Richard Min|Green Kaminer Min & Rockmore LLP
420 Lexington Ave. Ste. 2821|New York, NY 10170
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rmin@gkmrlaw.com|www.gkmrlaw.com

Fellow of the International Academy of Family Lawyers

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From: Flores, Rommy <RFlores@gibsondunn.com>
Sent: Tuesday, November 26, 2024 8:10 PM
To: Richard Min <rmin@gkmrlaw.com>
Cc: Camilla Redmond <credmond@gkmrlaw.com>; Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse, Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Michael Banuchis <MBanuchis@gkmrlaw.com>; Kelly Shindell DeLacey <kelly@drsfamilylaw.com>; Garrett de Liévano Maria <maria@drsfamilylaw.com>
Subject: Re: Dias v. Dias: Petitioner's Declaration

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Hi Richard, Kelly —

Any update on this?

Thanks,

Rommy

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Associate Attorney

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RFlores@gibsondunn.com

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333 South Grand Avenue, Los Angeles, CA 90071-3197

On Nov 24, 2024, at 8:55 AM, Flores, Rommy <RFlores@gibsondunn.com> wrote:

Thanks, Richard. Please let us know when you are able.

Rommy Flores
Associate Attorney

T: +1 213.229.7966 | M: +1 213.335.1672

RFlores@gibsondunn.com

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Richard Min <rmin@gkmrlaw.com>

Sent: Sunday, November 24, 2024 2:54 AM

To: Flores, Rommy <RFlores@gibsondunn.com>

Cc: Camilla Redmond <credmond@gkmrlaw.com>; Davis, Thad A.

<TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse,

Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>;

Cheung, Aaron J. <ACheung@gibsondunn.com>; Michael Banuchis

<MBanuchis@gkmrlaw.com>; Shindell DeLacey Kelly <kelly@drsfamilylaw.com>; Garrett

de Liévano Maria <maria@drsfamilylaw.com>

Subject: RE: Dias v. Dias: Petitioner's Declaration

Ok, will follow up with him. Thanks.

Richard Min|Green Kaminer Min & Rockmore LLP

420 Lexington Ave. Ste. 2821|New York, NY 10170

O: 212.681.6400|D: 212.257.1944|F: 212.681.6999

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From: Flores, Rommy <RFlores@gibsondunn.com>
Sent: Saturday, November 23, 2024 11:55 AM
To: Richard Min <rmin@gkmrlaw.com>
Cc: Camilla Redmond <credmond@gkmrlaw.com>; Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse, Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>; Michael Banuchis <MBanuchis@gkmrlaw.com>; Shindell DeLacey Kelly <kelly@drsfamilylaw.com>; Garrett de Liévano Maria <maria@drsfamilylaw.com>
Subject: Re: Dias v. Dias: Petitioner's Declaration

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Richard,

We understand that Petitioner has a black briefcase where he keeps these documents and that he generally has that with him and had it with him in Armenia. Specifically, Respondent notes that for travel the family used the US consular documents turned over to the court but also used the Conservatória do Registo Civil Lisboa for all three children in the alternative. Can you please follow up with Mr Dias again on whether he has this black briefcase and whether these documents are there. If not, we think his declaration needs to be updated to include the steps taken to look for/locate these specific travel documents that can be used without any US identification.

Thanks so much,

Rommy

Rommy Flores
Associate Attorney

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RFlores@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

On Nov 21, 2024, at 11:11 AM, Richard Min <rmin@gkmrlaw.com> wrote:

Casimiro had the houses in Lisbon and Algarve checked.

Richard Min|Green Kaminer Min & Rockmore LLP

420 Lexington Ave. Ste. 2821|New York, NY 10170

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From: Flores, Rommy <RFlores@gibsondunn.com>

Sent: Thursday, November 21, 2024 9:22 AM

To: Camilla Redmond <credmond@gkmlaw.com>; Davis, Thad A.

<TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse,

Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>;

Cheung, Aaron J. <ACheung@gibsondunn.com>

Cc: Richard Min <rmin@gkmlaw.com>; Michael Banuchis <MBanuchis@gkmlaw.com>;

DeLacey Kelly Shindell <kelly@drsfamilylaw.com>; Garrett de Liévano Maria

<maria@drsfamilylaw.com>

Subject: Re: Dias v. Dias: Petitioner's Declaration

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Camilla, Richard —

Following up on this. Can you please update.

Thanks!

Rommy

Rommy Flores
Associate Attorney

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RFlores@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

On Nov 18, 2024, at 2:10 PM, Flores, Rommy <RFlores@gibsondunn.com> wrote:

Thanks, Camilla.

Can you confirm that Mr. Dias has not yet searched his other homes for the documents? The declaration notes that he has searched only *one* in Portugal. And if he has not searched the other homes, is he planning on doing so? Per Respondent, the family generally used the U.S. Consular documents and the Children's original birth certificates for travel, and these were with the family in Armenia or in Portugal, and Respondent did not take them with her when she fled Armenia in April 2024.

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RFlores@gibsondunn.com

GIBSON DUNN
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197

From: Camilla Redmond <credmond@gkmrlaw.com>
Sent: Monday, November 18, 2024 2:07 PM
To: Flores, Rommy <RFlores@gibsondunn.com>; Davis, Thad A. <TDavis@gibsondunn.com>; Waddick, Nicole <NWaddick@gibsondunn.com>; Hesse, Danielle <DHesse@gibsondunn.com>; Feldman, Will <WFeldman@gibsondunn.com>; Cheung, Aaron J. <ACheung@gibsondunn.com>
Cc: Richard Min <rmin@gkmrlaw.com>; Michael Banuchis <MBanuchis@gkmrlaw.com>; Kelly Shindell DeLacey <kelly@drsfamilylaw.com>; Maria Garrett de Liévano <maria@drsfamilylaw.com>
Subject: Dias v. Dias: Petitioner's Declaration

Dear Counsel,

Attached please find Casimiro's declaration in accordance with Paragraph 9 of the stipulated order for dismissal (ECF No. 185).

Kind regards,

Camilla

Camilla Redmond Costa| Green Kaminer Min & Rockmore LLP

420 Lexington Ave. Ste. 2821|New York, NY 10170

O: 212.681.6400|F: 212.681.6999

credmond@gkmrlaw.com|www.gkmrlaw.com

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